

42390P11237

PATENT

## REMARKS

Claims 1-30 of the application stand rejected. Claims 14 and 28 have been amended herein to more clearly define the scope of the presently claimed invention. Applicants respectfully request reconsideration of pending Claims 1-30 in light of the amendments and remarks herein.

Claim objections

Claim 28 was objected to because a period was missing at the end of the sentence. Applicants respectfully submit that Claim 28 has been amended to correct the informality and requests the Examiner to withdraw the objection to this claim.

35 U.S.C. §103

Claims 1-30 stand rejected under 35 U.S.C. §103 as being unpatentable over the combination of U.S. Publication No 2002/0144083 ("Wang") in view of U.S. Patent No. 5,926,819 ("Doo"). Applicants respectfully traverse the Examiner's rejection.

Wang describes "software-based speculative pre-computation and multithreading" (Wang, title) while Doo teaches "in-line triggers" (Doo, title). The Examiner concedes that Wang does not explicitly disclose "selecting an entry in a trigger table, the entry associated with the trigger instruction and entry is referenced by the trigger table". The Examiner suggests, however, that it would have been obvious to one of ordinary skill in the art to combine the teachings of Wang with Doo to do so. Applicants respectfully disagree.

First and foremost, Applicants submit that the references cannot be combined in the manner suggested by the Examiner. The mere fact that both the references discuss "triggers" does not render the combination obvious. In the present case, Wang describes the use of triggers to aid speculative pre-computation and multithreading, while Doo describes triggers for use in a database context. Applicants respectfully contend that the Examiner's suggestion that Doo is an "analogous computer system" to Wang is erroneous. These are *non-analogous* areas of art, one dealing with the computer system hardware while the other deals with application level software. As a result, Applicants

42390P11237

PATENT

submit that regardless of what is taught by each reference, they simply cannot be combined to arrive at the claimed invention. Thus, even assuming arguendo that Doo did teach "selecting an entry in a trigger table and/or entry is associated with a trigger instruction" (which it does not, as discussed below), there is absolutely no teaching in Doo and/or Wang to teach one of ordinary skill in the art to how combine the references to arrive at the claimed invention.

Furthermore, as can be expected from references in non-analogous areas of art, there is no suggestion in either reference for such a combination. As set out in M.P.E.P. § 706.02(j), "(t)here must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings." Applicants strongly disagree that that there is any such motivation in the present case. The Examiner states that it would have been obvious to combine Wang with Doo to render other elements of the claimed invention unpatentable because "one of ordinary skill in the art would be motivated to select an entry in a trigger table to replicate the trigger instructions as suggested by Doo". Applicants respectfully submit that this does not suggest a motivation, merely a result. There is no teaching in either Wang or Doo to actually suggest this combination. As previously stated, the mere fact that the combination *may* provide an advantage does not *prima facie* mean that the combination is obvious. In the present case, as discussed in greater detail above, there is no teaching in either reference to suggest that it would have been obvious to one of ordinary skill in the art to combine the references in the manner described by the Examiner. Applicants therefore respectfully submit that the combination of these references is improper and respectfully request the Examiner to withdraw the 35 U.S.C. § 103 rejections to Claims 1-30.

Even assuming arguendo these references were properly combined, Applicants respectfully submit that the combination of Wang and Doo does not render Claims 1-30 unpatentable. As previously stated, the Examiner concedes that Wang does not explicitly teach significant elements of the claimed invention, but suggests that these elements are taught by Doo. Applicants respectfully disagree. Applicants submit that the section of Doo highlighted by the Examiner (Doo, Col. 6, lines 30-31) does not teach "selecting an entry in a trigger table". Rather, this section states "Finally, the database system sets a

42390P11237

PATENT

trigger flag, associating that trigger with the table in the data dictionary, to indicate that the in-line trigger is to fire for the table (step 204).” “Associating a trigger with a table” cannot be reasonably construed to mean “selecting an entry in a trigger table”. Similarly, the Examiner suggests that Doo teaches the element of “entry is referenced by the trigger table”. Applicants respectfully point out that the element of the claim, in full, reads “executing an auxiliary code referenced by the entry in the trigger table” and that Doo does *not* teach this element. There is no mention in Doo of any type of auxiliary code. The section highlighted by the Examiner (Col. 6, presumably lines 57-58, since the line numbers do not appear in the Office Action) states “[T]he resulting cursor should include memory or a reference to memory for trigger-type specific parameters.” Nothing in this language teaches or suggests any of the elements of the claimed invention, i.e., this language does not teach or suggest “selecting an entry in a trigger table” and/or that the “[auxiliary code reference by the] entry is associated with a trigger instruction.”

In summary, Applicants respectfully submit that Wang, alone or in combination with Doo, does not teach or suggests the necessary elements to render the claimed invention unpatentable. Applicants therefore respectfully submit that neither of these references renders independent Claims 1, 13, 15, 22, 24 and 29 unpatentable. Similarly, the references cannot render all claims dependant on these independent claims unpatentable. Applicants therefore respectfully request the Examiner to withdraw the rejection to Claims 1-30 under 35 U.S.C. §103.

42390P11237

PATENT

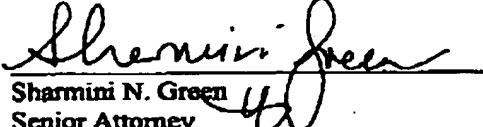
## CONCLUSION

Based on the foregoing, Applicants respectfully submit that the applicable objections and rejections have been overcome and that pending Claims 1-30 are in condition for allowance. Applicants therefore respectfully request an early issuance of a Notice of Allowance in this case. If the Examiner has any questions, the Examiner is invited to contact the undersigned at (310) 406-2362.

If there are any additional charges, please charge Deposit Account No. 50-0221.

Respectfully submitted,

Dated: August 20, 2004



Sharmi N. Green  
Senior Attorney  
Intel Corporation  
Registration No. 41,410  
(310) 406-2362